

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

NATALIA KUPIEC, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware
Corporation, and US SEARCH, LLC, a
Delaware Limited Liability Company,

Defendants.

No. 21-cv-971

Hon. John F. Kness

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i)**

PLEASE TAKE NOTICE that Plaintiff Natalia Kupiec hereby voluntarily dismisses this action pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) without prejudice as to all individual and class claims brought in her Complaint.

Federal Rule of Civil Procedure 41(a)(1) provides, in relevant part that: "the plaintiff may dismiss an action without a court order by filing: (i) a notice of dismissal before the opposing party serves either an answer or a motion for summary judgment" Fed. R. Civ. P. 41(a)(1)(A)(i). Defendants have neither answered Plaintiff's complaint nor moved for summary judgment. Accordingly, the action may be dismissed without prejudice and without an order of the Court.

Respectfully Submitted,

NATALIA KUPIEC, individually and on behalf of
all others similarly situated,

Dated: April 19, 2021

By: /s/ Benjamin H. Richman
One of Plaintiff's Attorneys

Benjamin H. Richman
brichman@edelson.com
Ari J. Scharg
ascharg@edelson.com
EDELSON PC
350 North LaSalle Street, 14th Floor
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378

Attorneys for Plaintiff and the Class